

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)
)
 Plaintiff,)) No.: 4:15-CR-404-HEA-NAB-30
)
 vs.)
)
 OSCAR DILLON, III, et al.,)
)
 Defendant.)

**DEFENDANT OSCAR DILLON III' MOTION FOR LEAVE TO FILE REPLY
IN SUPPORT OF HIS MOTION FOR JUDGMENT OF ACQUITTAL, OR
ALTERNATIVELY FOR A NEW TRIAL**

Come now the defendant, Oscar Dillon, III, by and through his undersigned attorneys, and respectfully moves this Honorable Court to enter an order allowing him 21 days to file a reply in support of his motion for judgment of acquittal, or alternatively, for a new trial. In support, the following is offered:

1. On April 7, 2021, a jury convicted Mr. Dillon and Mr. Grady of conspiracy to distribute controlled substances, attempted obstruction of justice, and conspiracy to commit money laundering.
2. After this Court granted an extension of time to file post-trial motions, Mr. Dillon, along with co-defendant Michael Grady, filed a joint motion for judgment of acquittal, or alternatively, for a new trial. R. 3320.
3. The government filed their 60-page response, after being granted numerous extensions, on July 20, 2021.
4. Because the burden is on Mr. Dillon, he respectfully asks this Court to

grant him 21 days to file a reply in support of his motion for judgment of acquittal, or alternatively, for a new trial. A reply is necessary to address numerous issues and arguments raised by the government in their response.

5. Sentencing is currently scheduled for October 14, 2021. As such, allowing 21 days to file a reply should not effect the sentencing date, as the reply would be due on August 10, 2021.

Wherefore, for the reasons stated above, defendant Oscar Dillon III respectfully moves this Honorable Court to enter an order allowing him 21 days to file a reply in support of his motion for judgment of acquittal, or alternatively, for a new trial.

Respectfully submitted,

s/ Vadim Glozman
An Attorney for Oscar Dillon, III

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CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2021, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: all Attorneys of record.

s/ Vadim A. Glozman